

HONORABLE J. RICHARD CREATURA

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

ROBERT RUSSELL, individually,  
Plaintiff,

v.

JOSEPH SAMEC, individually; SEAN  
BISHOP, individually; and JOHN DOES 1-10,  
Defendants.

Case No. 2:20-cv-00263-RSM-JRC

**[PROPOSED] ORDER ON PLAINTIFF  
ROBERT RUSSELL'S MOTION FOR  
PRELIMINARY INJUNCTION AGAINST  
DEFENDANT JOSEPH SAMEC**

**NOTICE IS HEREBY GIVEN** that on June 5, 2020, the Honorable J. Richard Creatura, Plaintiff Robert Russell's Motion for Preliminary Injunction Against Defendant Joseph Samec came on regularly for hearing.

On proof made to the Court's satisfaction, being satisfied that the continued republication of the material attached as Exhibits 1 through 12 to the Declaration of Robert Russell in support of the Motion ("Russell Declaration") presents a continuing threat of imminent and irreparable harm to Plaintiff that cannot be remedied by an award of damages, and for good cause appearing,

**IT IS HEREBY ORDERED** that Defendant Joseph Samec is enjoined and restrained from continuing to publish or republishing the material attached as Exhibit 1, Exhibit 2, Exhibit 3, Exhibit 4, Exhibit 5, Exhibit 6, Exhibit 7, Exhibit 8, Exhibit 9, Exhibit 10, Exhibit 11 and

1 Exhibit 12 to the Russell Declaration, including any material substantially similar to the  
2 foregoing exhibits.

3 The Injunction shall remain in effect pending further Order of the Court, which reserves  
4 jurisdiction to modify this injunction as the ends of justice may require.

5 IT IS SO ORDERED.

6  
7 DATED: \_\_\_\_\_, 2020.

8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  

---

HONORABLE J. RICHARD CREATURA

Presented by:

BUCHALTER  
A Professional Corporation

By: /s/ Bradley P. Thoreson  
Bradley P. Thoreson, WSBA #18190  
Teva F. Sempel, WSBA #54896  
1420 Fifth Avenue, Suite 3100  
Seattle, WA 98101-1337  
Telephone: 206.319.7052  
Email: bthoreson@buchalter.com  
Email: tsempel@buchalter.com

*Attorneys for Plaintiff Robert Russell*

**CERTIFICATE OF SERVICE**

I hereby certify that on May 14, 2020, I electronically filed the preceding document with the Clerk of the Court using the CM/ECF system, which will send notification to the counsel of record in this case.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

/s/ Marci L. Brandt  
Marci L. Brandt, Legal Assistant

BN 40189369v1